

EXHIBIT 4



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February 19, 2019

VIA EMAIL

Kyle Farrar, Esq.
Kaster, Lynch, Farrar & Ball, LLP
1010 Lamar, Suite 1600
Houston, TX 77002

Re: Susman/Loveland v. Goodyear, et al.

Dear Mr. Farrar:

In response to your letter of February 8, 2019, we are searching for videotapes and ASCII formatted transcripts to the depositions previously produced in this case. We do not have the videotapes to any of these depositions in our office, and we are investigating to see if we can locate copies for you. We will get back to you after our investigation is complete.

Your letter of February 14, 2019 correctly outlines the proposal I was making with regard to use of the depositions of the former Goodyear employees. In short, I was proposing that the transcripts be used as though they were taken for use in this case, and that Goodyear preserves all objections that it would have had if the depositions were actually taken in this matter. If this deposition testimony is presented at trial, it would need to be presented in a way so that it is not disclosed that the testimony was actually taken from the Goodyear witness in a separate lawsuit against Goodyear. I appreciate that you are taking a look at the transcripts to see if we can reach that agreement, and that you will get back to me.

Very truly yours,

GREENSFELDER, HEMKER & GALE, P.C.

By

A handwritten signature in black ink, appearing to be 'ESB', written over a horizontal line.

Edward S. Bott, Jr.

ESB/rlv

cc: Paul E. Godlewski (via email)